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EIS PROJECT (AR) PF DEPARTMENT OF ENERGY  
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Management Systems Division  
**NEPA**

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MAR 28 2000

To: *Cindy Brown*  
*Tom Wichmann* Fax: *208 526-1184*

From: *Paul F.X. Dunigan, Jr.* Date: *3/29/00*  
*(509) 376-6667*  
*FAX (509) 376-0306*

Re: *INEEL HLW DRAFT* Pages: *3*  
*EIS*

CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

*Thank you for sending msg. Hope this helps!*  
*J. Bayers for Paul F.X. Dunigan, Jr.*

**HANFORD ADVISORY BOARD**  
A Site Specific Advisory Board, Chartered under the Federal Advisory Committee Act

March 7, 2000

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Mr. Thomas L. Wichmann  
Document Manager  
U.S. DOE, Idaho Operations Office  
850 Energy Drive; Mail Stop 1108  
Idaho Falls, ID 83401-1563

Subject: INEEL High-Level Waste Draft EIS

Dear Mr. Wichmann:

Some members of the Hanford Advisory Board (HAB) attended the February 3 presentation conducted by staff of the U.S. Department of Energy on the Idaho High-Level Waste and Facilities Disposition Draft Environmental Impact Statement (EIS). On behalf of the HAB, we are submitting the following statement to be considered by DOE.

The HAB is not prepared at this time to provide specific comments on the EIS. The Hanford vitrification plant has not been constructed and thus will not be available for several years. In addition, when it becomes operational, it will take many years to vitrify Hanford tank wastes. Thus, it would be premature at this time for us to comment on the EIS alternative that would send INEEL high-level wastes to Hanford for vitrification.

However, three consistent positions of our Board relate to the issue.

1. In Advice #13 and subsequent pieces of advice, we have stated that if another site sends waste to Hanford for treatment, it should not be sent until a treatment facility is built and operating. Once treated, the waste must be returned to the sending site.  
52-1 11.E (6) + 52-5 11.E (6)
2. We cannot support Idaho's waste coming to Hanford until all of Hanford's high-level waste has been treated. We emphasized in our recent statement on tank wastes that the Hanford tanks are one of the most urgent environmental threats to the country. We have three types of tanks: those that have leaked, those that will leak, and those that will leak again. The single-shell tanks are already beyond their design life and the double-shell tanks will reach that point before the vitrification process is completed. Vitrification of these wastes must proceed expeditiously and be completed before a major accident occurs with the aging tanks.  
52-2 11.E (6)
3. We have indicated in several pieces of advice that if any wastes come to Hanford for treatment or disposition "the sending site should cover all costs." The Hanford budget is not adequate to cover even the costs of our own cleanup efforts in  
52-3 11.E (3) + 52-6 11.E (9)

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Environmental Facilitation  
Phone 208-288-5041 Fax 208-221-0900

Nuvotec, Inc. - Administration  
723 The Parkway, Suite 200, Richland, WA 99352  
Phone 509-943-6219 Fax 509-943-6228

- New Information -

Idaho HLW & FD EIS

D-123

DOE/EIS-0287


Document 52, Hanford Advisory Board (Merilyn Reeves), Richland, WA  
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accordance with our Tri-Party Agreement and regulatory requirements. The impact of offsite wastes on the inadequate budget of Hanford and the environmental impacts of any diversion of Hanford cleanup funds must be factored into decisions on offsite wastes and should be thoroughly analyzed in this EIS. The Hanford cleanup dollars should not be used to subsidize the receipt, treatment, and/or storage of offsite wastes.

52-4  
VII.A(6)

[We would appreciate being consulted as this process continues forward, particularly when a preferred alternative or other decisions are being considered which might impact Hanford.]

Very truly yours,



Merilyn B. Reeves, Chair  
Hanford Advisory Board

cc: Keith Klein, Manager, DOE-RL  
Dick French, Manager, DOE-ORP  
Tom Fitzsimmons, Director, Washington Department of Ecology  
Chuck Clarke, Regional Administrator, U.S. Environmental Protection Agency  
Wade Ballard, Acting Designated Federal Official  
The Oregon and Washington Congressional Delegations  
Michael Gearheard, U.S. Environmental Protection Agency  
Dan Silver, Washington Department of Ecology

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Document 53, Public Comment Hearing, February 24, 2000, Pasco, WA  
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Control # DC-53

UNITED STATES DEPARTMENT OF ENERGY  
IDAHO OPERATIONS OFFICE

PUBLIC HEARING

DRAFT ENVIRONMENTAL IMPACT STATEMENT

IDAHO HIGH-LEVEL WASTE AND FACILITIES DISPOSITION

February 24, 2000

6:00 p.m.

Doubletree Inn

Pasco, Washington

BRIDGES & ASSOCIATES  
Certified Shorthand Reporters  
P. O. Box 223  
Pendleton, OR 97801  
(541) 276-9491 - (800) 358-2345